

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

CUSTOMS AND TAX ADMINISTRATION OF
THE KINGDOM OF DENMARK
(SKATTEFORVALTNINGEN) TAX REFUND
SCHEME LITIGATION

MASTER DOCKET

18-md-2865 (LAK)

This document relates to: 18-cv-09434, 18-cv-09439,
18-cv-09489, 18-cv-09490,
18-cv-09491, 18-cv-09492,
18-cv-09494, 18-cv-09497,
18-cv-09498, 18-cv-09505,
18-cv-09507, 18-cv-09511,
18-cv-09515, 18-cv-09549,
18-cv-09552

STIPULATION AND [PROPOSED] ORDER OF PARTIAL VOLUNTARY DISMISSAL

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiff Skatteforvaltningen (“SKAT”) and defendants Bernard Tew, Andrea Tew, Stephanie Tew, and Vincent Tew (collectively, “Defendants”) hereby stipulate and agree that SKAT’s claims against Defendants in the actions captioned *Skatteforvaltningen v. Tew, LP Retirement Plan & Vincent Tew*, No. 18-cv-09492-LAK; *Skatteforvaltningen v. Autoparts Pensions Group Trust, Bluegrass Investment Management, LLC & Bernard Tew*, No. 18-cv-09549-LAK; *Skatteforvaltningen v. Bluegrass Investment Management, LLC Retirement Plan & Bernard Tew*, No. 18-cv-09515-LAK; *Skatteforvaltningen v. Bluegrass Retirement Group Trust, Bluegrass Investment Management, LLC & Bernard Tew*, No. 18-cv-09511-LAK; *Skatteforvaltningen v. Casting Pensions Group Trust, Bluegrass Investment Management, LLC & Bernard Tew*, No. 18-cv-09498-LAK; *Skatteforvaltningen v. Central Technologies Pensions Group Trust, Bluegrass Investment Management, LLC & Bernard Tew*, No. 18-cv-09507-LAK; *Skatteforvaltningen v. Industrial*

Pensions Group Trust, Bluegrass Investment Management, LLC & Bernard Tew, No. 18-cv-09497; *Skatteforvaltningen v. JSH Farms LLC 401(K) Plan, Bluegrass Investment Management, LLC, Bernard Tew & George Hofmeister*, No. 18-cv-09489-LAK; *Skatteforvaltningen v. KRH Farms LLC 401(K) Plan, Bluegrass Investment Management, LLC, Bernard Tew & George Hofmeister*, No. 18-cv-09491-LAK; *Skatteforvaltningen v. MGH Farms LLC 401(K) Plan, Bluegrass Investment Management, LLC, Bernard Tew & George Hofmeister*, No. 18-cv-09439-LAK; *Skatteforvaltningen v. MSJJ Retirement Group Trust, Bluegrass Investment Management, LLC, Bernard Tew & George Hofmeister*, No. 18-cv-09552-LAK; *Skatteforvaltningen v. SRH Farms LLC 401(K) Plan, Bluegrass Investment Management, LLC, Bernard Tew & George Hofmeister*, No. 18-cv-09434-LAK; *Skatteforvaltningen v. Triton Farms LLC 401(K) Plan, Bluegrass Investment Management, LLC, Bernard Tew & George Hofmeister*, No. 18-cv-09490-LAK; *Skatteforvaltningen v. Tew Enterprises, LLC Retirement Plan & Andrea Tew*, No. 18-cv-09494-LAK; and *Skatteforvaltningen v. SV Holdings, LLC Retirement Plan & Stephanie Tew*, No. 18-cv-09505-LAK, that are part of these consolidated proceedings are hereby voluntarily dismissed by SKAT, with prejudice, with each party bearing its own costs and attorney's fees, pursuant to the terms of the settlement agreement entered on June 7, 2021 and approved by the United States Bankruptcy Court, Eastern District of Kentucky, Lexington Division. *In re Bernard V. Tew, Andrea B. Tew*, No. 20-51078-tnw (Bankr. E.D. Ky. June 23, 2021), ECF No. 232. This dismissal is not intended to and does not affect any of the claims asserted against any other defendants in the above-captioned actions.

Dated: New York, New York
December 21, 2021

By: /s/
Marc A. Weinstein
Neil J. Oxford
William R. Maguire
Dustin P. Smith
HUGHES HUBBARD & REED LLP
One Battery Park Plaza
New York, New York 10004-1482
Telephone : (212) 837-6000
Fax : (212) 422-422-4726
marc.weinstein@hugheshubbard.com
neil.oxford@hugheshubbard.com
bill.maguire@hugheshubbard.com
dustin.smith@hugheshubbard.com

*Counsel for Plaintiff Skatteforvaltningen
(Customs and Tax Administration of the
Kingdom of Denmark)*

By: Bernard V. Tew
Bernard V. Tew
By: Andrea B. Tew
Andrea B. Tew
By: Stephanie Tew
Stephanie Tew
By: Vincent Tew
Vincent Tew

Dated: New York, New York
December 21, 2021

By: /s/ Dustin P. Smith
Marc A. Weinstein
Neil J. Oxford
William R. Maguire
Dustin P. Smith
HUGHES HUBBARD & REED LLP
One Battery Park Plaza
New York, New York 10004-1482
Telephone : (212) 837-6000
Fax : (212) 422-422-4726
marc.weinstein@hugheshubbard.com
neil.oxford@hugheshubbard.com
bill.maguire@hugheshubbard.com
dustin.smith@hugheshubbard.com

*Counsel for Plaintiff Skatteforvaltningen
(Customs and Tax Administration of the
Kingdom of Denmark)*

By: _____
Bernard V. Tew

By: _____
Andrea B. Tew

By: _____
Stephanie Tew

By: _____
Vincent Tew

SO ORDERED:

Hon. Lewis A. Kaplan
United States District Judge